THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF DEBTORS' ONE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No.

:

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

NOTICE OF HEARING ON DEBTORS' ONE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)

PLEASE TAKE NOTICE that on June 7, 2011, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "<u>Debtors</u>"), filed their one hundred fifty-first omnibus objection to claims (the "Debtors' One Hundred Fifty-First Omnibus Objection to Claims"), and that a

hearing (the "Hearing") to consider the Debtors' One Hundred Fifty-First Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on July 21, 2011 at 10:00 a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Debtors' One Hundred Fifty-First Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabeth Gasparini, Esq., and Andrea Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and

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Evan Fleck, Esq.); so as to be so filed and received by no later than **July 7, 2011 at 4:00 p.m.** (**Eastern Time**) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Debtors' One Hundred Fifty-First Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' One Hundred Fifty-First Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: June 7, 2011

New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

•

Debtors. : (Jointly Administered)

-----X

DEBTORS' ONE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS ONE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIN ECKOLS, AT 214-746-7700.

TO THE HONORABLE JAMES M. PECK UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors, in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "<u>Debtors</u>"), respectfully represent as follows:

Relief Requested

- 1. The Debtors file this one hundred fifty-first omnibus objection to claims (the "One Hundred Fifty-First Omnibus Objection to Claims"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 6664], seeking disallowance and expungement of the claims listed on Exhibit A annexed hereto.
- 2. The Debtors have examined the proofs of claim identified on Exhibit A (collectively, the "No Liability Claims") and have determined that they assert claims against entities that are not debtors in these jointly administrated chapter 11 cases. Accordingly, the Debtors have no liability for the No Liability Claims, and the Debtors request they be disallowed and expunged in their entirety.
- 3. The Debtors reserve all their rights to object on any basis to any No Liability Claim as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

- 5. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 6. On September 17, 2008, the United States Trustee for Region 2 (the "<u>U.S.</u> <u>Trustee</u>") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").
- 7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].
- 8. On July 2, 2009, this Court entered an order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271]. The Bar Date Order identified the names and case number of each of the Debtors in these chapter 11 cases. (Bar Date Order at 1 n.2.) The Bar Date Order requires, among other things, that each proof of claim "state the name and case number of the specific Debtor against which it is filed" (Bar Date Order at 6.) A copy of the Bar Date Order was made publicly available at http://www.lehman-docket.com.
- 9. Claimants received notice of the Bar Date Order by mail. (*See* Notice of Deadlines for Filing Proofs of Claim (the "<u>Bar Date Notice</u>").) The Bar Date Notice was also

published in The New York Times (International Edition), The Wall Street Journal (International Edition), and The Financial Times. A list of the Debtors in these chapter 11 cases and their respective case numbers was included as part of the Bar Date Notice and the instructions to the Court-approved proof of claim form. (Bar Date Notice at Schedule A.) In accordance with the Bar Date Order's requirement that claims be filed against the proper Debtor, the Bar Date Notice stated, in bold-face type and in capital letters, that "YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS." (*Id.* at 3 (emphasis in original).)

10. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The No Liability Claims Should Be Disallowed and Expunged

11. In their review of the claims filed on the claims register in these chapter 11 cases and maintained by the Court-appointed claims agent, the Debtors have identified the claims on Exhibit A as claims against entities that are not debtors in these chapter 11 cases. A filed proof of claim is "deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). If an objection refuting at least one of the claim's essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc'ns Corp.*, No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that "such claim is unenforceable

against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).

documentation establishes that they are claims against a non-Debtor entity. They include claims against foreign and domestic affiliates of the Debtors that are not Debtors in these jointly administered chapter 11 cases. The No Liability Claims do not set forth any legal justification for asserting a claim against a Debtor in these cases, and if the No Liability Claims remain on the claims register, the potential exists for recoveries by parties who do not hold valid claims against the Debtors' estates. Accordingly, the Debtors respectfully request the Court disallow and expunge the No Liability Claims listed on Exhibit A attached hereto.

Notice

- have served notice of this One Hundred Fifty-First Omnibus Objection to Claims on (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) each claimant listed on Exhibit A; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9635]. The Debtors submit that no other or further notice need be provided.
- 14. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as is just.

Dated: June 7, 2011

New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

EXHIBIT A

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		CASE	FILED		TOTAL CLAIM	
	NAME	NUMBER	DATE	CLAIM #	DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ADKINS MATCHETT & TOY LINDEN HOUSE, 55 SOUTH BAR BANBURY, OXON , OX16 9AB UNITED KINGDOM	08-13600 (JMP)	02/23/2009	4811	\$83,728.96	No Liability Claim
2	ALWAYS IN SEASON INC P.O BOX 271502 HOUSTON, TX 77277-1502		08/31/2009	9947	\$178.28	No Liability Claim
3	AMANN ESTABROOK CONSERVATION ASSOCIATES 435 HUDSON ST RM 200 NEW YORK, NY 100143962		07/16/2009	5466	\$541.88	No Liability Claim
4	ATS SPA VIA FERRUCCI MILANO, 2-20145	08-13555 (JMP)	11/12/2008	587	\$14,370.14	No Liability Claim
5	BELOW VON ANTON & CO. GROSSE THEATERSTRASSE 42 HAMBURG, 20354 GERMANY		07/31/2009	6787	Undetermined	No Liability Claim
6	BOWMAN GILFILLAN INC PO BOX 785812 SANDTON, 2146 SOUTH AFRICA	08-13555 (JMP)	09/18/2009	17761	Undetermined	No Liability Claim
7	BUSINESS VALUATION ADVISORS LLC DOUGLAS K. RUDLEY 5601 GRANITE PARKWAY, SUITE 740 PLANO, TX 75024-6654		01/20/2009	1809	\$6,649.98	No Liability Claim

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		CASE	FILED		TOTAL CLAIM	
	NAME	NUMBER	DATE	CLAIM #	DOLLARS	REASON FOR PROPOSED DISALLOWANCE
8	C.V.I G.V.F. (LUX) MASTER S.A.R.L. (UK) TRANSFEROR: KNIGHTSBRIDGE GUARDING LTD C/O CARVAL INVESTORS UK LIMITED KNOWLE HILL PARK, FAIRMILE LANE COBHAM, SURREY, KT11 2PD UNITED KINGDOM	08-13555 (JMP)	07/27/2009	6181	\$595,913.9 2	No Liability Claim
9	CADET, PIERRE ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007	08-13555 (JMP)	09/18/2009	19099	\$504.00	No Liability Claim
10	CADET, PIERRE ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33340	\$504.00	No Liability Claim
11	CHAPMAN AND CUTLER LLP 595 MARKET STREET, 26TH FLOOR SAN FRANCISCO, CA 94105		11/03/2008	468	\$21,900.00	No Liability Claim
12	CHECO, MANUEL NYPD PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33406	\$1,188.00	No Liability Claim
13	CIGANEK, THOMAS PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET - 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33407	\$1,188.00	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
14	CLAYTON SERVICES, INC. C/O JOSEPH L. CLASEN AND CHRISTOPHER MAJOR ROBINSON & COLE LLP 1055 WASHINGTON BLVD. STAMFORD, CT 06901	08-13555 (JMP)	09/22/2009	30569	\$27,279.00	No Liability Claim
15	COMNY SYSTEM CO., LTD 1-28-17 NAGATA NAKANO-KU TOKYO, 13 JAPAN		09/10/2009	11245	\$5,674.00	No Liability Claim
16	COSTELLO MAIONE SCHUCH DBA CMS INNOVATIVE CONSULTANTS 8 FLETCHER PLACE MELVILLE, NY 11747	08-13555 (JMP)	10/02/2008	73	\$239,695.78	No Liability Claim
17	D'AMBROSI, CARLO PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET - 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33409	\$396.00	No Liability Claim
18	DELOITTE & TOUCHE FINANCIAL ADVISORY SERVICES LIMITED 30/F, BUNDER CENTER 222 YAN AN ROAD EAST SHANGHAI, 200002 CHINA	08-13555 (JMP)	09/22/2009	31322	\$71,542.65	No Liability Claim
19	DON PROHASKA & ASSOCIATES 3465 REGENT AVENUE EUSENE, OR 97401		07/20/2009	5780	\$53,804.48	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
20	EMC (BENELUX) BV, SARL C/O RECEIVEABLE MANAGEMENT SERVICES (""RMS"") PO BOX 5126 TIMONIUM, MD 21094	08-13555 (JMP)	09/21/2009	22288	\$241,249.67	No Liability Claim
21	EMIRATES TRADING ESTABLISHMENT AL MAKHAWI BUILDING PO BOX 1059 DUBAI, 1059 UNITED ARAB EMIRATES	08-13555 (JMP)	08/31/2009	9986	\$640.00	No Liability Claim
22	EURO TRADING CAPITAL MARKET 13 RUE VIVIENNE PARIS, 75002 FRANCE	08-13555 (JMP)	07/22/2009	5881	\$91,609.00	No Liability Claim
23	EUROSERVE HIZMET VE ISLETMECILIK A.S. STFA IS MERKEZI ANKARA ASFALTI YESILVADI SOKAK NO: 1 KAT: 5 BOSTANCI ISTANBUL, 34744 TURKEY		09/17/2009	19701	\$71,127.00	No Liability Claim
24	FAYER, RUSSELL A. 111 CHURCH STREET WHITE PLAINS, NY 10601		10/09/2009	37330	Undetermined	No Liability Claim
25	FIRSTCO LLC M/035 AL DURRAH TOWER NEXT CROWNE PLAZA SHEIK ZAYED ROAD DUBAI, 214373 UNITED ARAB EMIRATES		08/21/2009	8878	\$5,449.58	No Liability Claim
26	FORSYTH STREET ADVISORS LLC 588 BROADWAY SUITE 1208 NEW YORK, NY 10012		08/19/2009	8747	\$1,650.00	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
27	GARRAD HASSAN CANADA, INC. MARC LEBLANC 151 SLATER ST., SUITE 806 OTTAWA, ONTARIO, K1P 5H3 CANADA	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	12/05/2008	1223	\$5,633.05	No Liability Claim
28	GKG LAW, P.C. (FORMERLY GALLAND, KHARASCH, GREENBERG, FELLMAN & SWIRSKY) 1054 31ST STREET, N.W., STE. 200 WASHINGTON, DC 20007-4492		11/05/2008	504	\$6,345.00	No Liability Claim
29	GRAY, GLENN N. PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET - 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33386	\$396.00	No Liability Claim
30	GREENFIELD'S OTP LLC 15 PALATINE ROAD CALIFON, NJ 07830	08-13555 (JMP)	07/28/2009	6550	\$900,000.00	No Liability Claim
31	HAWKINS DELAFIELD & WOOD, LLP ATTN: KENNETH B. ROBERTS ONE CHASE MANHATTAN PLAZA, 42ND FL. NEW YORK, NY 10005		09/21/2009	20100	\$229,994.46	No Liability Claim
32	HUNTON & WILLIAMS LLP C/O LINDSAY K. BIGGS, ESQ. 951 EAST BYRD STREET RICHMOND, VA 23219	08-13555 (JMP)	02/11/2009	2701	\$1,673,165.78	No Liability Claim
33	INMARKETS INC. 8105 STONEHILL DRIVE PLANO, TX 75025	08-13555 (JMP)	12/08/2008	1247	\$172,090.71	No Liability Claim
34	INTERLINE BRANDS, INC. DBA SEXAUER 801 WEST BAY STREET JACKSONVILLE, FL 32204	08-13555 (JMP)	04/17/2009	3820	\$2,124.55	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
35	IRODA, NAGY ES TROCSANYI UGYVEDI UGOCSA UTCA 4/B BUDAPEST, 1126 HUNGARY	08-13555 (JMP)	10/06/2009	36738	\$11,666.00	No Liability Claim
36	JAMES, NOEL PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET - 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33385	\$396.00	No Liability Claim
37	JONES LANG LASALLE PROPERTY CONSULTANTS PTE LTD. C/O JOSEPH D. FRANK FRANK/GECKER LLP 325 N. LASALLE STREET, SUITE 625 CHICAGO, IL 60654	08-13555 (JMP)	09/08/2009	10678	\$118,522.00*	No Liability Claim
38	K.C. DAT LTD 17TH FLOOR 3 LOCKHART ROAD WANCHAI, HONG KONG	08-13555 (JMP)	08/12/2009	8049	\$5,679.00	No Liability Claim
39	KYRIAKIDES GEORGOPOULOS & DANIOLOS ISSAI 28, DIMITRIOU SOUTSOU STREET ATHENS, 11521 GREECE	08-13555 (JMP)	09/21/2009	19845	\$10,325.39	No Liability Claim
40	LANDAU MEDIA MONITORING AG & CO. KG FRIEDRICHSTRABE 30 BERLIN, 10969 GERMANY		06/29/2009	5020	Undetermined	No Liability Claim
41	LOYENS & LEOFF 26 THROGMORTON STREET LONDON, EC2N 2AN UNITED KINGDOM	08-13555 (JMP)	07/21/2009	5797	\$6,914.00	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
42	LYRECO (CANADA) INC 7303 WARDEN AVE, SUITE 200 MARKHAM, ONT., L3R 5Y6 CANADA		11/21/2008	829	Undetermined	No Liability Claim
43	MAGSTAT CONSULTING SRL VIA MONTE GRAPPA 3-40121 BOLOGNA (BO), ITALY		12/09/2008	1259	\$3,474.00	No Liability Claim
44	MARKET NEWS INTERNATIONAL INC. 40 FULTON ST 5TH FL NEW YORK, NY 10038	08-13555 (JMP)	06/08/2009	4807	\$9,467.89	No Liability Claim
45	MTS CETO SA AL. ARMII LUDOWEJ 26 WARSAW, 00-609 POLAND	08-13555 (JMP)	09/21/2009	24731	\$26,948.83	No Liability Claim
46	NITTAN CAPITAL SINGAPORE PTE LTD MICHELLE CHUA 9 RAFFLES PLACE, # 16 - 21 REPUBLIC PLAZA II , 048619 SINGAPORE	08-13555 (JMP)	10/10/2008	167	Undetermined	No Liability Claim
47	NITTAN FX LIMITED 3-14, 3-CHOME NIHONBASHI HONGOKUCHO CHUO-KU TOKYO 103-0021, JAPAN, JAPAN		08/10/2009	7939	\$3,931.94	No Liability Claim
48	ON THE WALL GALLERY, (DUBLIN) LTD. (OR KERLIN GALLERY) JOHN KENNEDY, DIRECTOR ANNE'S LANE, SOUTH ANNE STREET DUBLIN 2, IRELAND	08-13555 (JMP)	11/03/2008	461	\$992.25	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM#	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
49	PARKER CLARK EXECUTIVE RECRUITMENT INC 420 LEXINGTON AVE RM 2547 NEW YORK, NY 101702599		07/15/2009	5371	\$1,538.66	No Liability Claim
50	PESANTES, SERGIO ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007		09/18/2009	19063	\$792.00	No Liability Claim
51	PIERRE, HEURTELOU NYPD PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET 3RD FL NEW YORK, NY 10007		09/18/2009	33350	\$792.00	No Liability Claim
52	PLATZ, JAMES ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007		09/18/2009	19059	\$396.00	No Liability Claim
53	PRYOR, JEFFREY M. ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007		09/18/2009	19058	\$396.00	No Liability Claim
54	RABASSA, AUGUSTIN ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007		09/18/2009	19057	\$396.00	No Liability Claim
55	RICCIUTO, GERARD ATTN: NADINE POPE PAID DETAIL UNIT 51 CHAMBERS STREET- 3RD FLOOR NEW YORK, NY 10007		09/18/2009	19056	\$396.00	No Liability Claim

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	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
56	RIGHT MANAGEMENT, INC. ATTN: PRINCE ALTEE THOMAS, ESQ. FOX ROTHSCHILD LLP 2000 MARKET STREET, 20TH FLOOR PHILADELPHIA, PA 19103-3222	08-13555 (JMP)	07/17/2009	5503	\$133,000.00	No Liability Claim
57	RIVERA, HECTOR J. PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET - 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33355	\$1,188.00	No Liability Claim
58	SAS SOFTWARE LTD WITTINGTON HOUSE HENLEY ROAD MEDMENHAM MARLOW BUCKS, SL7 2EB UNITED KINGDOM	08-13555 (JMP)	07/27/2009	6306	\$120,094.70	No Liability Claim
59	SIGMA ENERGY SOLUTIONS INC. DAVID A. HAZELTON 2000 DAY HILL ROAD WINDSOR, CT 06095		02/18/2009	2894	\$66,348.32	No Liability Claim
60	SMYTH, EDWARD P. PAID DETAIL UNIT ATTN: NADINE POPE 51 CHAMBERS STREET 3RD FLOOR NEW YORK, NY 10007		09/18/2009	33327	\$396.00	No Liability Claim
61	SUAREZ & NARVASA 3/F CSJ BUILDING 105 AGUIRRE STREET LEGASPI VILLAGE MAKATI CITY, 4149 PHILIPPINES	08-13555 (JMP)	09/14/2009	12627	\$2,280.24	No Liability Claim

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		CASE	FILED		TOTAL CLAIM	
	NAME	NUMBER	DATE	CLAIM #	DOLLARS	REASON FOR PROPOSED DISALLOWANCE
62	SULLIVAN, CHRISTIAN		09/18/2009	33329	\$396.00	No Liability Claim
	PAID DETIAL UNIT					·
	ATTN: NADINE POPE					
	51 CHAMBERS STREET-3RD FLOOR					
	NEW YORK, NY 10007					
63	TAVERAS, ROBIN		09/18/2009	33330	\$396.00	No Liability Claim
	NYPD PAID DETAILUNIT					
	ATTN: NADINE POPE					
	51 CHAMBERS STREET 3RD FLOOR					
	NEW YORK, NY 10007					
64	TEAM RELOCATIONS		07/31/2009	6790	\$57,581.26	No Liability Claim
	DRURY WAY					
	BRENT PARK					
	LONDON, NW10 0JN					
	UNITED KINGDOM					
65	TEJERA, JUAN		09/18/2009	33331	\$396.00	No Liability Claim
	PAID DETAIL UNIT					
	ATTN: NADINE POPE					
	51 CHAMBERS STREET-3RD FLOOR					
	NEW YORK, NY 10007					
66	THON STANHOPE HOTEL SA	08-13555	08/17/2009	8586	\$259.71	No Liability Claim
	AVENUE LOUISE 91- 93	(JMP)				
	BRUSSELS, 1050					
	BELGIUM					
67	TOWERS PERRIN	08-13555	10/27/2008	394	\$314,012.50	No Liability Claim
	ATTN: GAIL HIESTARD	(JMP)				
	263 TRESSER BOULEVARD					
	ONE STAMFORD PLAZA, 6TH FLOOR					
	STAMFORD, CT 06901					

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		CASE	FILED		TOTAL CLAIM	
	NAME	NUMBER	DATE	CLAIM #	DOLLARS	REASON FOR PROPOSED DISALLOWANCE
68	VALENTINE, CHRISTOPHER ATTN: NADINE POPE		09/18/2009	33332	\$396.00	No Liability Claim
	PAID DETAIL UNIT					
	51 CHAMBERS STREET- 3RD FLOOR					
	NEW YORK, NY 10007					
69	VAZQUEZ JR., JUAN		09/18/2009	33334	\$396.00	No Liability Claim
	ATTN: NADINE POPE					•
	PAID DETAIL UNIT					
	51 CHAMBERS STREET 3RD FLOOR					
	NEW YORK, NY 10007					
70	VAZQUEZ, ELVIS		09/18/2009	33333	\$396.00	No Liability Claim
	NYPD PAID DETAIL UNIT					
	ATTN: NADINE POPE					
	51 CHAMBERS STREET 3RD FLOOR					
	NEW YORK, NY 10007					
71	VUCKOVIC, JOSIP		09/18/2009	33335	\$396.00	No Liability Claim
	ATTN: NADINE POPE					
	PAID DETAIL UNIT					
	51 CHAMBERS STREET 3RD FLOOR					
	NEW YORK, NY 10007					
72	WEDBUSH MORGAN SECURITIES INC.	08-13555	02/23/2009	2984	\$614,830.00*	No Liability Claim
	ATTN: CHARLES LACHAUSSEE,	(JMP)				
	CORPORATE COUNSEL					
	1000 WILSHIRE BOULEVARD					
	LOS ANGELES, CA 90017					
73	XEROX CORP	08-13555	03/31/2009	3632	\$3,606.05	No Liability Claim
	XEROX CAPITAL SERVICES LLC	(JMP)				
	ATTN: VANESSA ADAMS					
	1301 RIDGEVIEW DRIVE-450					
	LEWISVILLE, TX 75057					

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IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

	NAME	CASE NUMBER	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
74	YAHOO! HOTJOBS C/O BIALSON, BERGN & SCHWAB ATTN: LAWRENCE SCHWAB / THOMAS GAA 2600 EL CAMINO REAL, STE 300 PALO ALTO, CA 94306	08-13555 (JMP)	09/21/2009	24496	\$116,802.94	No Liability Claim
				TOTAL	\$6,162,729.55	

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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ORDER GRANTING DEBTORS' ONE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)

Upon the one hundred fifty-first omnibus objection to claims, dated June 7, 2011 (the "One Hundred Fifty-First Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking disallowance and expungement of the No Liability Claims on the grounds that they assert claims against entities that are not debtors in these jointly administered chapter 11 cases, all as more fully described in the One Hundred Fifty-First Omnibus Objection to Claims; and due and proper notice of the One Hundred Fifty-First Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the One Hundred Fifty-First Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' One Hundred Fifty-First Omnibus Objection to Claims.

procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9635]; and the Court having found and determined that the relief sought in the One Hundred Fifty-First Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Fifty-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the One Hundred Fifty-First Omnibus

Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the "No Liability Claims") are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the disposition of the No Liability Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the One Hundred Fifty-First Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated:	, 2011	
	New York, New York	
		UNITED STATES BANKRUPTCY JUDGE